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By ECF

Hon. Andrew E. Krause
The Hon. Charles L. Brieant Jr. Federal Building and U.S. Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *S.E.C. v. Concord Management LLC and Michael Matlin*,
No. 23-CV-8253 (S.D.N.Y.) (AEK)

Dear Judge Krause,

We represent Defendants Concord Management LLC and Michael Matlin in the above-captioned action. In accordance with this Court's May 15, 2025 Order (ECF No. 59), we write jointly with Plaintiff, the Securities and Exchange Commission, to provide the Court with a status update. Subsequent to the parties submitting their May 15 letter to the Court, the parties continued to engage in good faith efforts to determine whether this matter could be resolved. However, to date, the parties have not been able to reach an agreement to resolve the matter. Accordingly, the parties are submitting a joint proposed scheduling order setting forth a schedule for the completion of discovery.

We thank the Court for its attention to this matter.

Respectfully submitted,

Benjamin S. Fischer
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